

UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LAURE BOUDET,

Plaintiff,

vs.

GREYHOUND LINES, INC., and LAIDLAW  
INTERNATIONAL, INC.

Defendants.

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**RULE 26  
DISCLOSURE**

CIVIL ACTION NO.:  
07 CIV 3098  
(PKL)

**LAURE BOUDET  
DISCLOSURE PURSUANT TO  
FED. R. CIV. P. 26**

Plaintiff, LAURE BOUDET, submits the following disclosure pursuant to *Fed. R. Civ. P. 26*.

**Rule 26(a)(1)(A)**

**Individuals likely to have discoverable information:**

Based upon information available, Plaintiff's counsel identifies the following individuals likely to have discoverable information relating to Defendant's defenses in this case:

- Laure Boudet;
- New York State Trooper Stannard;
- Unknown named New York State Troopers that investigated the accident
- Unknown named NTSB employees that investigated the accident

- Greyhound passenger Rosy Trandutrieu
- Greyhound passenger Lora Csillag
- Greyhound passenger Malary Ulna
- Greyhound passenger Lyonel Caselis
- Greyhound passenger Stephanie Souma
- Greyhound passenger Anne-Claude David
- Greyhound passenger Jorge Rivera
- Greyhound passenger Elisee Lombo Kaleba
- Greyhound passenger Karine Frigone
- Greyhound passenger Liliane Milaud
- Greyhound passenger Rochelle Wenick
- Greyhound passenger Marie Koide
- Greyhound passenger Christina Talledo
- Greyhound passenger Carolina Bages
- Greyhound passenger Sherry Ann Geioge
- Greyhound passenger Voshana Geioge
- Greyhound passenger Mamadou Bah
- Greyhound passenger Gnalen Bah
- Greyhound passenger Annika Thornton
- Greyhound passenger Sylvia Crazier
- Greyhound passenger Abi-Sara Machold
- Greyhound passenger Christian Yopa Feze
- Greyhound passenger John Schindler

- Greyhound passenger Paola Garcia
- Greyhound passenger Maria Garcia
- Greyhound passenger Zibo Wang
- Greyhound passenger Joseph Placid
- Greyhound passenger Josee Renaud
- Greyhound passenger Caroline Larouche
- Greyhound passenger Akiko Honda
- Greyhound passenger Guillaume Bedard
- Greyhound passenger Natalie Bouchard
- Greyhound passenger Daniel Eliosoff
- Greyhound passenger Daivd Regis Riond
- Greyhound passenger Marc-Oliver D'Amours
- Greyhound passenger Jessica Lawson
- Greyhound passenger Robert Caplin
- Greyhound passenger Lorenzo Santiago
- Greyhound passenger Kareem Santiago
- Greyhound passenger Terista Santiago
- Greyhound passenger Steven Puntel
- Greyhound passenger Marie Tesano
- Greyhound passenger Berthony Tesano
- Greyhound passenger Kirsten Anderson
- Greyhound passenger Lauren Bickford-Bushey
- Greyhound passenger Cynthia Lamarshe

- Greyhound passenger Jacqueline Bertand
- Greyhound bus employees responsible for the maintenance and repairs of the bus

Plaintiff also anticipates identifying additional witnesses after the receipt of additional discovery. Plaintiff reserves the right to supplement this response as its discovery and investigation reveals additional persons who may have relevant knowledge.

**Rule 26(a)(1)(B)**

**Documents that may be used to support Plaintiff's claims (other than by impeachment):**

Plaintiff will produce the following documents:

- New York State Police Report (attached hereto as Exhibit A)
- New York State Police Photographs
- Plaintiff's medical records
- Plaintiff's photographs (attached hereto as Exhibit B)

Plaintiff reserves the right to supplement this response as its discovery and investigation reveals additional documents that should be produced in accordance with *Fed. R. Civ. P. 26(a)(1)(B)*.

**Rule 26(a)(1)(C)**

**Damages claimed:**

Plaintiff will claim damages for serious permanent personal injuries in the sum set forth in the complaint including out of pocket expenses that were incurred. Copies of the medical records will be provided at a later date.

Plaintiff will claim damages for living expenses while residing in Montreal for three months while receiving medical treatment.

Plaintiff will claim damages to personal belonging that were lost or damaged at the time of the accident.

Plaintiff will claim lost earnings and future earnings capacity.

**Rule 26(a)(1)(D)**

Not applicable.

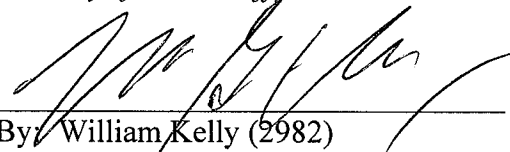
**Disclosure of Experts**

Plaintiff has not yet retained any experts. Plaintiff will supplement this response when and if it retains an expert(s) in accordance with the Case Management Order.

Dated: Syracuse, New York  
June 26, 2007

GOLDBERG SEGALLA LLP

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